

**Desai v. University of Massachusetts Memorial Medical Center, et al.**  
**Civil Action No. 4:19-cv-10520-TSH**

**EXHIBITS INDEX TO**

**EXHIBITS TO PLAINTIFF'S STATEMENT OF FACTS IN DISPUTE**

<b><u>TAB</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>BATES</u></b>
A.	Affidavit of Charu Desai, MD	NONE
B.	Curriculum Vitae of Charu Desai, MD	CD00042-00045
C.	Affidavit of Max Rosen, M.D.,M.P.H., dated December 15, 2021 (redacted)	NONE
D.	Letter of Reference from Dr. Jerry Balikian, MD dated May 14 2001	CD00065
E.	Letter of Reference from Dr. Jeffrey Leppo, MD	CD00075-76
F.	Letter of Reference from Dr. Richard Irwin, MD	CD00078-79
G.	Letter of Reference from Dr. Carl D'Orsi, MD	CD00080
H.	Letter of Reference from Dr. Krishna Kandarpa, MD	UMM00331
I.	Letter of Reference from Dr. Jerry Balikian, MD (2015)	CD00039
J.	Letter from Joseph Ferrucci, MD	CD00038
K.	Letter of Reference from Dr. Aaron Harman, MD	CD00035
L.	Letter of Reference from Dr. Richard Irwin, MD (March 2018)	CD00133
M.	Letter of Reference from Dr. Andrew Chen, MD	CD00089
N.	Letter of Reference from Dr. Gopal Vijayaraghavan, MD	CD00090
O.	Letter of Reference from Dr. George Eypper, MD	CD00037
P.	Letter of Reference from Dr. Lacey McIntosh, MD	CD00036
Q.	Letter of Reference from Dr. Karl Uy, MD	CD00085-86
R.	Deposition of Charu Desai, MD	None
S.	Deposition of Max P. Rosen, MD	None

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<b><u>TAB</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>BATES</u></b>
T.	University of Massachusetts Medical School: Annual Faculty Report and Evaluations of Professional Activities re: Charu Desai, MD from 2012-2013 through 2017-2018	UMM 00266-00313
U.	Call and/or Weekend/Holiday Coverage Policy, Revised October 2015	UMM-04922-26
V.	M. Rosen email to J. Ferrucci re: Charu Desai	UMM-04631
W.	R. Mowland Email to M. Shah re: Dr. Desai May 19, 2017	Umm-04927
X.	M. Rosen email to K. Dill re: Question	UMM-04659
Y.	UMassMemorial Letter to Charu Desai, MD re: Physician Employment Agreement December 8, 2008; Faculty Recruitment Authorization Form	UNN-00333-46; UM00092
Z.	Notebook Pages	CD 00141-42
AA.	Academic and Administrative Time Policy Update June 8, 2017	CD 00001-2
BB.	UMassMemorial Change Form May 9, 2016	UMM-19971, UMM-06988
CC.	C. Desai Email to M. Rosen re: Response to Meeting with Dr Rosen May 31, 2016	UMM-04739-40, UMM-30115
DD.	University of Massachusetts Medical School Faculty Annual Performance Review Karin Dill, MD May 10, 2018	UMM 790-799
EE.	UMassMemorial Letter to Karin Dill MD June 2, 2015	UMM-07666-68
FF.	FY2016 Days Off Clinical Schedule Summary	UMM 8912-8913
GG.	UMassMemorial Letter to Maria F. Barile MD August 2, 2018	UMM-09208-9, 25726-7
HH.	M. Rosen Email to Karin Dill re: AY19 Non Clinical Time and Chest Schedule September 24, 2018	UMM-28327
II.	KD Email to Charu Desai et al June 14, 2017 re: Minutes from Chest Division Meeting 6/14/17	UMM-04377-78
JJ.	M. Rosen Email to D. Brenna t al re: Desai Confidential February 8, 2017	UMM-00707-8, UMM-24652-4
KK.	K. Dill Email to C. Desai re: Vacation Request April 19, 2016	UMM-04340
LL.	Deposition of Abhijit Roychowdhury MD June 18, 2021	None

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<b><u>TAB</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>BATES</u></b>
MM.	Michael Murphy Letter to Patty Woods Re: Desai v UMass Memorial Medical Center, Inc. et al MCAD Docket No.: 18WEM01247 EEOC/HUD: 16C-2018-01520 July 17, 2018	None
NN.	M. Streeter Email to M. Rosen October 3, 2017	UMM-05003
OO.	K. Dill Email to M. Rosen Re: Chest Division March 30, 2017	UMM-30055
PP.	Deposition of Joseph Ferrucci MD June 15, 2021	None
QQ.	J. Makris Email to M. Rosen re: Chest Resident Workflow October 4, 2016	UMM-04742
RR.	University of Massachusetts Medical School Faculty Annual Performance Review Charu Desai MD May 10, 2018	None
SS.	Defendant, Karin Dill MD's Answers to Plaintiff's Second Set of Interrogatories	None
TT.	UMASS Memorial Medical Center Review and Action Form re: C. Desa June 21, 2017	None
UU.	Peer Review of Charu Desai July 1, 2016 – June 30, 2017	CD 00049
VV.	Count of Accession Number Chart	UMM-08943-4
WW.	Reviewer Karin Dill February 2, 2016 – January 28, 2021 Type: CT	UMM 3687-3688
XX.	Letter from M. Murphy to C. Muchison re: Desai v UMass Memorial Medical Center, Inc. et al MCAD Docket No.: 18WEM01247 EEOC/HUD: 16C-2018-01520 February 21, 2019	None
YY.	Answer to Amended Complaint and Jury Demand	None
ZZ.	D. Brennan Email to M. Rosen re: Radiology Issues-Summary January 8, 2017	UMM-04299-300
AAA.	M. Rosen Email to D. Brennan et al re: Meeting – Review of Radiology Issues at Marlborough Desai Confidential February 8, 2017	UMM-00707-6
BBB.	K. Green Email to M. Rosen re Confidential QA February 1, 2017	UMM-04745-6
CCC.	Methods Slide	UMM-03723
DDD.	Defendant, Max Rosen , MD's Answers to Plaintiff's Second Set of Interrogatories	None
EEE.	M. Rosen Email to D. Litmanovich re: QA Project	UMM-00545

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FFF.	D. Brennan Email to M. Rosen re: Incident Today 09/21/2017 September 21, 2017	UMM-00539
GGG.	D. Brennan Email to C. Desai re: Incident with Dr. Dill Today September 21, 2017	UMM-03867
HHH.	C. Desai Email to D. Brennan September 21, 2017	UMM-04549
III.	M. Rosen Email to K. Emrich re: Confidential September 22, 2017	UMM-04617
JJJ.	M. Rosen Email to R. Mowlood et al re: Consultant for QA project October 13, 2017	UMM-00546-7
KKK.	M. Rosen Email to D. Litmanovich re: Consultant for QA Project December 7, 2017	UMM-00548-51
LLL.	M. Rosen Email to R. Mowlood re: Project December 26, 2017	UMM-00552
MMM.	Chart with QACH	UMM-00690-3
NNN.	Expert Report of James F. Gruden M.D. Email July 30, 2021	None
OOO.	Deposition of Ella Kazerooni MD October 21, 2021	None
PPP.	Chest CT QA Study CONFIDENTIAL January 26, 2017	UMM-00699-705
QQQ.	M. Rosen Letter to D. Brennan MD August 13, 2019	UMM-09636
RRR.	UMass Chan Medical School Radiology Organization Chart	None
SSS.	S. Tosi MD and M. Rosen MD Letter to C. Desai re: Notice of Termination of Employment March 9, 2018	UMM-00253
TTT.	M. Rosen Letter to H. Alencar MD re: Offer of One Year Extension of Employment April 10, 2014	UMM-05670-1
UUU.	C. Desai Email re: Meeting to Review QA Data	UMM-03957-8
VVV.	Handwritten Notes April 24, 2018 TOP OF PAGE ILLEGIBLE	UMM-03722
WWW.	C. Desai Email re: Summary of April 24 <sup>th</sup> Meeting Regarding QA Data	UMM-03951
XXX.	UMass Memorial Health Care Diagnostic Imaging	UMM-00574-77, UMM-00618, UMM-00675-77, UMM-00602-4
YYY.	Unspecified Sender Email to M. Rosen re: Confidential – Cardiothoracic Radiology Staffing	UMM-04998-501

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ZZZ.	K. Leblanc Email to M. Rosen et al re: Confidential October 3, 2017	UMM-04490
AAAA.	K. Leblanc Email to M. Rose re: Follow Up October 11, 2017	UMM-04754
BBBB.	M. Rosen Email to J. Ferrucci re: C. Desai October 11, 2017	UMM-04631
CCCC.	University of Massachusetts Medical School: Faculty Annual Performance Review re Dill Karin MD May 10, 2018	UMM-01790-99
DDDD.	UMass Memorial Medical Center Reappointment re: Charu S. Desai MD March 17, 2015 (Credentialing & Reappointment)	UMM-03672, 641, 609, 611, 261
EEEE.	E. Pope Letter to UMass Memorial Health Care, Inc. Sharon Bonner re: Confirmation of Appointment Charu S. Desai MD May 22, 2015	UMM-03258, 2914, 2855, 3261, 2920, 2884, 3514-16, 2888, 3516, 3170, 2897, 3524, 3178, 2908, 3596, 3594, 3188, 3602, 3639, 3630, 3672, 3645, 3521-22, 3644
FFFF.	S. Roach Letter to C. Desai MD re: Resignation April 4, 2019	UMM-03638
GGGG.	Affidavit of Steven P. Roach	None
HHHH.	UMass Memorial Employee Separation Form Charu Desai November 30, 2018	UMM-0252
IIII.	Radiologists Separated from UMass Memorial Medical Group Since January 1, 2015	UMM-3690-1
JJJJ.	D. Brennan Letter to M. Rosen re: Dr. Tyagi February 8, 2018	UMM-26505
KKKK.	M. Rosen Email to K. Dill re: Confidential November 7, 2017	UMM-30046-48
LLLL.	Joseph T. Ferrucci MD CV	UMM-13538
MMMM.	Employee Date Spreadsheet and DOB documents	
NNNN.	Address Change Form re: Dr. Agrawal change 9/30/2017	UMM-9145
OOOO.	E. Dickson MD Letter to K. Cauley re: Notice of Termination March 1, 2013	UMM-3699
PPPP.	M. Rosen Letter to K. Cauley re: Notice of Written Termination March 13, 2013	UMM-3700-1

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QQQQ.	Radiologist Separated from UMass Memorial Medical Group Since January 1, 2015 with added ages and DOB	UMM-3690-1
RRRR.	Rosen 9 hires re: Alan J. Goldstein ND CV, etc.	UMM-14550, 14133-5, 14579-80, 20387-88, 25726-7, 27939, 29582-3, 14311-2, 7227, 7628,
SSSS.	Dr. A. Sheikh Letter to M. Rosen MD re: Hao S. Lo, MD Academic Rank Position April 25, 2019	UMM-17474, 17669
TTTT.	J. Ferrucci MD Letter to Byron Chen MD Offer January 15, 2012	UMM-10941-2
UUUU.	Employee Separation Form Ajay Wakhloo January 11, 2018	UMM-27518, 22367
VVVV.	S. Tosi MD Letter to E. Garwood MD re: Employment Offer June 15, 2018	UMM-14128-30, 20372-3, 25675-6, 27870-1, 7666-8
WWWW.	M. Felice MD Letter to . C. Wallace MD re: Offer Letter February 11, 2002	UMM-29174-5, 16575, 16231
XXXX.	Radiologists Hired by UMass Memorial Medical Group Since March 14, 2018	UMM-3689
YYYY.	M. Rosen MD Letter to B. Brochu MD re: Offer July 6, 2017	UMM-9984-6
ZZZZ.	M. Rosen Email to K. Dill re: Confidential Review February 16, 2018	UMM-4420
AAAAA.	M. Streeter EVP/COO Letter to K. Cauley MD re: Review Dispute September 9, 2013	UMM-3710,18, 20371-2
BBBBB.	Christopher P. Sereni MD CV	UMM-20351, 9208-9, 14128-30, 14070, 9970, 9984-6, 25638-9, 25675-6, 27812
CCCCC.	M. Podesta Email to C. Mathis et al re: Agrawal – Neuroradiology UMMMG May 9, 2016	UMM-5423-27, 9157-8
DDDDD.	M. Rosen MD Letter to Diagnostic Radiology Faculty re: Salary Structure February 14, 2017	UMM-3898
EEEE.	M. Rosen Email to C. Wilson re: Confidential February 3, 2015	UMM-22296

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FFFFF.	Excel Spreadsheet Print	UMM-0721-2
GGGGG.	Assistant Professor University of Massachusetts Memorial Medical Center CV	UMM-19882
HHHHH.	Byron Chen MD CV	UMM-10879
IIIII.	Hemang Kotecha DO CV	UMM-16639
JJJJJ.	Steven James Baccel MD CV	UMM-6169
KKKKK.	Christopher A Cerniglia DO ME FAOCR CV	UMM-10215-6
LLLLL.	Sathish Kumar Dundamadappa MBBS CV	UMM-12018
MMMMM.	J. Ferrucci MD Letter to D. Coughlin MD re: Appointment as Head June 11, 2008	UMM-11213
NNNNN.	UMass Employee (#60157) Introduction Form	UMM-6988, 9221-23
OOOOO.	S. Roach Letter to Charu Desai MD re: Staff Appointment February 9, 2015	UMM-3170
PPPPP.	S. Roach Letter to C. Desai re: reappointment July 11, 2017	None
QQQQQ.	Eric Nelson MD Letter to C. Desai MD re: Medical Staff Dues March 6, 2015	UMM-3342, 3307
RRRRR.	T. Caputo Letter to C. Desai MD re: Confirmation of Appointment May 18, 2017	UMM-3251
SSSSS.	M. Rosen MD Letter to G. Tyagi MD re: Offer of Employment September 30, 2016	UMM-26542-43
TTTTT.	C. Cavagnano Email to S. Tosi re: Confidential March 7, 2018	UMM-08958
UUUUU.	M. Rosen MD Letter to G. Watts MD re: Offer of Employment September 26, 2016	UMM-27870-1
VVVVV.	Academic Affiliation and Support Agreement 1998	UMM 2613-2640
WWWWW.	UMass Memorial Medical Center: Continuing Education Summary, Two Year Period C. Desai MD	UMM-3358-63
XXXXX.	University of Massachusetts Faculty Additional Compensation C. Desai MD May 2, 1994	UMM-0160-1, 0156-7
YYYYY.	B. Bigneaux Letter to JM Gauguet MD re: Appointment Confirmation Requirements March 13, 2013	UMM-14270, 14281

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<i>ZZZZZ.</i>	Handwritten Notes of Dr. K. Dill, MD	UMM 30112, 30115